IN THE UNITED STATES BANKRUPTCY COURT OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

BARRY E. ROTHERMEL : CASE NO. 1:18-bk-01415 HWV

PATRICIA ROTHERMEL :

Debtors : CHAPTER 13

SECOND MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN

AND NOW comes Debtors, Barry E. Rothermel and Patricia Rothermel, by and through their attorney, Gary J. Imblum, and respectfully represents:

- Debtors filed a Chapter 13 Bankruptcy to the above term and number on April 6, 2018.
- 2. Debtors filed the bankruptcy as an emergency filing due to a Sheriff sale scheduled for April 10, 2018.
- 3. Debtors' counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing.
- 4. A Motion for Extension of Time was filed on April 20, 2018 which was approved by an Order dated April 23, 2018.
 - 5. Debtor's schedules are due to the Court on or before June 4, 2018.

6. It is estimated that Debtors' counsel will need an additional 15 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtors respectfully requests that this Honorable Court issue an Order extending the deadline for Debtors to file bankruptcy schedules and plan until June 19, 2018.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.

/s/ Gary J. Imblum
Gary J. Imblum
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Attorney for Debtors

Dated: <u>June 4, 2018</u>

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the

foregoing MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF

SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED

DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND

CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

CHARLES J DEHART III ESQUIRE CHAPTER 13 TRUSTEE VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

/s/ Bernadette A. Davis

Bernadette A. Davis, Paralegal 4615 Derry Street Harrisburg PA 17111 717 238-5250

Fax No. 717 558-8990

Email: gary.imblum@imblumlaw.com

Dated: <u>June 4, 2018</u>

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IN RE:

BARRY E. ROTHERMEL : CASE NO. 1:18-bk-01415 HWV

PATRICIA ROTHERMEL :

Debtors : CHAPTER 13

ORDER

Upon consideration of Debtors' Second Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

IT IS HEREBY ORDERED AND DECREED that the deadline for filing the aforementioned pleadings in the above captioned case is extended through June 19, 2018.